

UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF TENNESSEE

NIKKI BOLLINGER GRAE, Individually and on Behalf of All Others Similarly Situated,)	Civil Action No. 3:16-cv-02267
)	
Plaintiff,)	Honorable Aleta A. Trauger
)	
vs.)	Magistrate Judge Jeffrey S. Frensley
)	
CORRECTIONS CORPORATION OF AMERICA, et al.,)	
)	
Defendants.)	
_____)	

DEFENDANTS' MOTION TO EXCLUDE TESTIMONY OF SCOTT DALRYMPLE

Defendants CoreCivic, Inc., Damon T. Hininger, David M. Garfinkle, Todd J. Mullenger, and Harley G. Lappin (collectively, “Defendants”) hereby move the Court for an order excluding the expert reports of Scott Dalrymple and precluding Lead Plaintiff Amalgamated Bank from offering his testimony at trial in this matter on grounds that his testimony is unreliable, irrelevant, and therefore inadmissible pursuant to Federal Rules of Evidence 403, 702, and 703 and *Daubert v. Merrell Dow Pharmaceuticals*, 509 U.S. 579 (1993). In support of this Motion, Defendants rely on reasons set forth in the accompanying Memorandum, and the Declaration of Morgan E. Whitworth and exhibits thereto. Defendants respectfully request that the Court grant this Motion, exclude the expert reports of Scott Dalrymple, and preclude Lead Plaintiff Amalgamated Bank from offering his testimony at trial.

DATED: November 20, 2020

Respectfully submitted:

/s/ Steven A. Riley

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CERTIFICATE OF SERVICE

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this 20th day of November, 2020.

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